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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92074795
Party	Defendant Kevin ComadrÃ¡n De Frutos
Correspondence Address	KARIN SEGALL LEASON ELLIS LLP ONE BARKER AVENUE, FIFTH FLOOR WHITE PLAINS, NY 10601 UNITED STATES Primary Email: lelitdocketing@leasonellis.com Secondary Email(s): segall@leasonellis.com 9148219072
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Date	09/29/2020
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Imagineer Co., Ltd.

Petitioner,

v.

Kevin Comadrán De Frutos,

Registrant.

Registration No. 5999237

Cancellation No. 92074795

REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION

Registrant Kevin Comadrán De Frutos ("Registrant"), by and through its attorneys, Leason Ellis LLP, hereby answers the Petition for Cancellation ("Petition") as follows:

1. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 of the Petition and, accordingly, denies the same.
2. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Petition and, accordingly, denies the same.
3. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of the Petition and, accordingly, denies the same.
4. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4 of the Petition and, accordingly, denies the same.
5. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5 of the Petition and, accordingly, denies the same.

6. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 6 of the Petition and, accordingly, denies the same.

7. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7 of the Petition and, accordingly, denies the same.

8. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8 of the Petition and, accordingly, denies the same.

9. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9 of the Petition and, accordingly, denies the same.

10. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 10 of the Petition and, accordingly, denies the same.

11. Registrant admits the allegations in paragraph 11 of the Petition.

12. Registrant admits the allegations in paragraph 12 of the Petition.

13. Registrant admits the allegations in paragraph 13 of the Petition.

14. Registrant admits the allegations in paragraph 14 of the Petition.

15. Registrant admits the allegations in paragraph 15 of the Petition.

16. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16 of the Petition and, accordingly, denies the same.

17. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 17 of the Petition and, accordingly, denies the same.

18. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 18 of the Petition and, accordingly, denies the same.

19. Registrant denies the allegation in paragraph 19 of the Petition.

20. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20 of the Petition and, accordingly, denies the same.

21. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 21 of the Petition and, accordingly, denies the same.

22. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 22 of the Petition and, accordingly, denies the same.

23. Registrant denies the allegations in paragraph 23 of the Petition.

24. Registrant admits the allegations in paragraph 24 of the Petition.

25. Registrant denies the allegations in paragraph 25 of the Petition.

26. Registrant denies the allegations in paragraph 26 of the Petition.

27. Registrant denies the allegations in paragraph 27 of the Petition.

28. Paragraph 28 of the Petition states only the legal consequences sought by Petitioner; to the extent there are any allegations in paragraph 28 of the petition, Registrants denies them.

29. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 29 of the Petition and, accordingly, denies the same.

30. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30 of the Petition and, accordingly, denies the same.

31. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 31 of the Petition and, accordingly, denies the same.

32. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 32 of the Petition and, accordingly, denies the same.

33. Registrants denies the allegations in paragraph 33 of the Petition.

34. Registrant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 34 of the Petition and, accordingly, denies the same.

35. Registrant denies the allegations in paragraph 35 of the Petition.

WHEREFORE, Registrant respectfully requests that this Cancellation No. 92074795 be dismissed with prejudice.

Dated: September 29, 2020
White Plains, New York

Respectfully submitted,

/karinsegall/

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Attorneys for Registrant

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing **ANSWER TO PETITION FOR CANCELLATION** was served via electronic mail upon Petitioner, this 29th day of September 2020, addressed as follows:

eastdocket@holleymenker.com, dsmith@holleymenker.com

/karinsegall/

Karin Segall